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By Email and ECF
Hon. Colleen McMahon
U.S. District Judge
U.S. Courthouse
500 Pearl Street
New York, NY 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 9/21/2020

September 18, 2020

MEMO ENDORSED

9/21/2020
CASE Adj to Dec. 2, 2020
At 2:15 p.m. - time excluded
through Dec 2, in the
interest of justice,
to facilitate defense
preparation and plea
discussions.

Re: United States v. Jonathon Skolnick
19 Cr. 730 (CM)

Dear Judge McMahon:

This letter is respectfully submitted on behalf of the parties to request an adjournment of the pre-trial conference currently scheduled to take place on September 30, 2020.

As Your Honor well knows, the MCC has been on lockdown since mid-March and consequently, I have not been able to visit with Mr. Skolnick to discuss his case at length. Additionally, because of the lockdown, the expert witness that has been retained to evaluate Mr. Skolnick has not been able to meet with him to complete his evaluation and as a result, I have not been able to have meaningful discussions with the Government about a possible resolution. Finally, I have been advised by the Government that there is additional discovery that is available for my review, and I anticipate visiting the U.S. Attorney's office in the near future to review that discovery.

In light of the above, the parties believe that it makes sense to adjourn the conference to a date in late November or early December convenient to the Court and the parties, in the hope that by the next date, the MCC will have reopened in a manner which is safe for attorney visits, so as to enable progress to be made on the case. The parties consent to the exclusion of time under the Speedy Trial Act.

Thank you in advance for your consideration of this request.

Respectfully submitted,

Avraham C. Moskowitz

Cc: AUSA Elizabeth Espinosa